

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262 (NRB)
THIS DOCUMENT RELATES TO:	
MAYOR AND CITY COUNCIL OF BALTIMORE, et al.,  Plaintiffs,  v.  CREDIT SUISSE AG, et al.,  Defendants.	No. 11-cv-5450 (NRB)

**OTC PLAINTIFFS' MOTION FOR AN ORDER APPROVING NOTICE PROGRAM  
AND PRELIMINARY APPROVAL OF PLAN OF DISTRIBUTION IN CONNECTION  
WITH THE CLASS SETTLEMENT WITH BARCLAYS BANK PLC**

**TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that, on a date and at a time to be determined by the Court, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, OTC Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order: (i) granting approval of Notice Program to Class Members in connection with the settlement (“Barclays Settlement” or “Settlement”) reached between OTC Plaintiffs and defendant Barclays Bank, plc (“Barclays”) in the above-captioned action; and (ii) preliminarily approving a Plan of Distribution of the settlement funds.

Submitted herewith in support of OTC Plaintiffs’ motion are: (i) the Memorandum of Law in Support of OTC Plaintiffs’ Motion for an Order Approving Notice Program and

Preliminary Approval of Plan of Distribution in Connection with the Class Settlement with Barclays Bank plc; (ii) the Declaration of Shannon Wheatman, Ph.D., and Exhibits 1–5 thereto; (iii) the Declaration of Seth Ard, and Exhibit 1 thereto; and (iv) the [Proposed] Order Approving OTC Plaintiffs’ Notice Program and Preliminary Approval of Plan of Distribution.

Dated: May 25, 2017

By: /s/ Michael D. Hausfeld

Michael D. Hausfeld  
Hilary Scherrer  
Nathaniel C. Giddings  
HAUSFELD LLP  
1700 St. NW, Suite 650  
Washington, D.C. 20006  
Telephone: (202) 540-7200  
Facsimile: (202) 540-7201  
mhausfeld@hausfeldllp.com  
hscherrer@hausfeldllp.com  
ngiddings@hausfeldllp.com

Gary I. Smith  
HAUSFELD LLP  
325 Chestnut Street  
Suite 900  
Philadelphia, PA 19106  
267-702-2318 Direct  
215-985-3270 Main  
215-985-3271 Fax  
gsmith@hausfeld.com

/s/ William Christopher Carmody

William Christopher Carmody (WC8478)  
Arun Subramanian (AS2096)  
Seth Ard (SA1817)  
Geng Chen (GC2733)  
SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas, 32nd Fl.  
New York, New York 10019  
Telephone: 212-336-3330  
Facsimile: 212-336-8340  
bcarmody@susmangodfrey.com  
asubramanian@susmangodfrey.com  
sard@susmangodfrey.com  
gchen@susmangodfrey.com

Marc M. Seltzer  
Glenn C. Bridgman  
SUSMAN GODFREY L.L.P.  
1901 Avenue of the Stars  
Los Angeles, California 90067-6029  
Telephone: (310) 789-3100  
mseltzer@susmangodfrey.com  
gbridgman@susmangodfrey.com

Matthew Berry  
Drew D. Hansen  
SUSMAN GODFREY LLP  
1201 Third Avenue, Suite 3800  
Seattle, WA 98101  
Telephone: (206) 516-3880  
Facsimile: (206) 516-3883  
mberry@susmangodfrey.com

dhansen@susmangodfrey.com

Barry C. Barnett (BB1984)

Karen Oshman

Michael Kelso

SUSMAN GODFREY L.L.P.

1000 Louisiana Street

Suite 5100

Houston, TX 77002-5096

Telephone: (713) 651-9366

bbamett@susmangodfrey.com

koshman@susmangodfrey.com

mkelso@susmangodfrey.com

*Interim Co-Lead Class Counsel for the OTC Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2017, I caused the aforementioned document to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Southern District of New York, on all parties registered for CM/ECF in the above-captioned matters.

Dated: May 25, 2017, at New York, New York.

/s/Seth Ard

Seth Ard